

CHAPTER 6

The Emission Unit Forms

EU-001

EU-002

EU-003

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INTRODUCTION TO THE EMISSION UNIT FORMS

If an activity is considered insignificant as defined in Rule 212(2) or an emission unit is exempt as defined in Rule 212(3), there is no need to complete an Emission Unit Form or any other form unless there is a process-specific emission limitation or standard in any applicable requirement associated with the emission unit (see Appendix C for Rule 212). Examples of process-specific emission limitations or standards in applicable requirement include: fugitive dust control or operating programs, Rule 331 (Table 31) particulate emission limits, 40 CFR Part 60 Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, Rules 401 and 402 sulfur dioxide emission limits for fuel burning sources, Rules 611 and 707 cold cleaners, Rules 612 and 708 vapor degreasers, and Rules 621 and 632 VOC emission limits.

Certain emission units are required to be included in the ROP application, but are not required to be in the issued ROP unless they are subject to process-specific emission limitations or standards. These emission units are identified in Rule 212(4).

All other emission units that are either in an existing permit or exempt with process-specific emission limitations must be included in both the ROP application and the issued ROP. This includes emission units exempt from the Permit to Install requirements under Rules 281(h), 285(r)(iv), 287(c), and 290, which have process-specific emission limitations and recordkeeping requirements and therefore need to be included in the ROP application and the issued ROP.

Based on these requirements, the AQD developed ROP application forms to capture information specific to each of these three specific types of emissions units. Each of the forms are discussed below. Figure 6-1 will help you determine if an emission unit should be included in your ROP application and which EU form to complete.

- The Exempt Emission Unit Form (EU-001) should be completed to identify emission units exempt under Rule 212(4). EU-001 form instructions begin on page 6-3.
- The Emission Unit Form for Rule 281(h), 285(r)(iv), 287(c), or 290 (EU-002) should be completed to identify each type of emission unit that meets the requirements of Rules 281(h), 285(r)(iv), 287(c), or 290. EU-002 form instructions begin on page 6-9.
- The Emission Unit Form (EU-003) should be completed to identify each emission unit with applicable requirements (unless already identified on the EU-002 form). EU-003 form instructions begin on page 6-15.

What is an Emission Unit?

An emission unit is a device or a group of devices that operate together with a dependency between devices. An emission unit contains one or more process devices and zero or more control devices and related stacks. Every process or control device in this application must be listed on EU-003, EU-002, or EU-001 forms.

See Operational Memorandum No. 6, Procedure for Determining Emission Units, for emission unit determination guidance. Operational Memorandum No. 6 is available from the Air Quality Division (AQD) upon request or on the Internet at: www.michigan.gov/deqair (select "Laws and Rules" then "Air Quality Division Operational Memorandums").

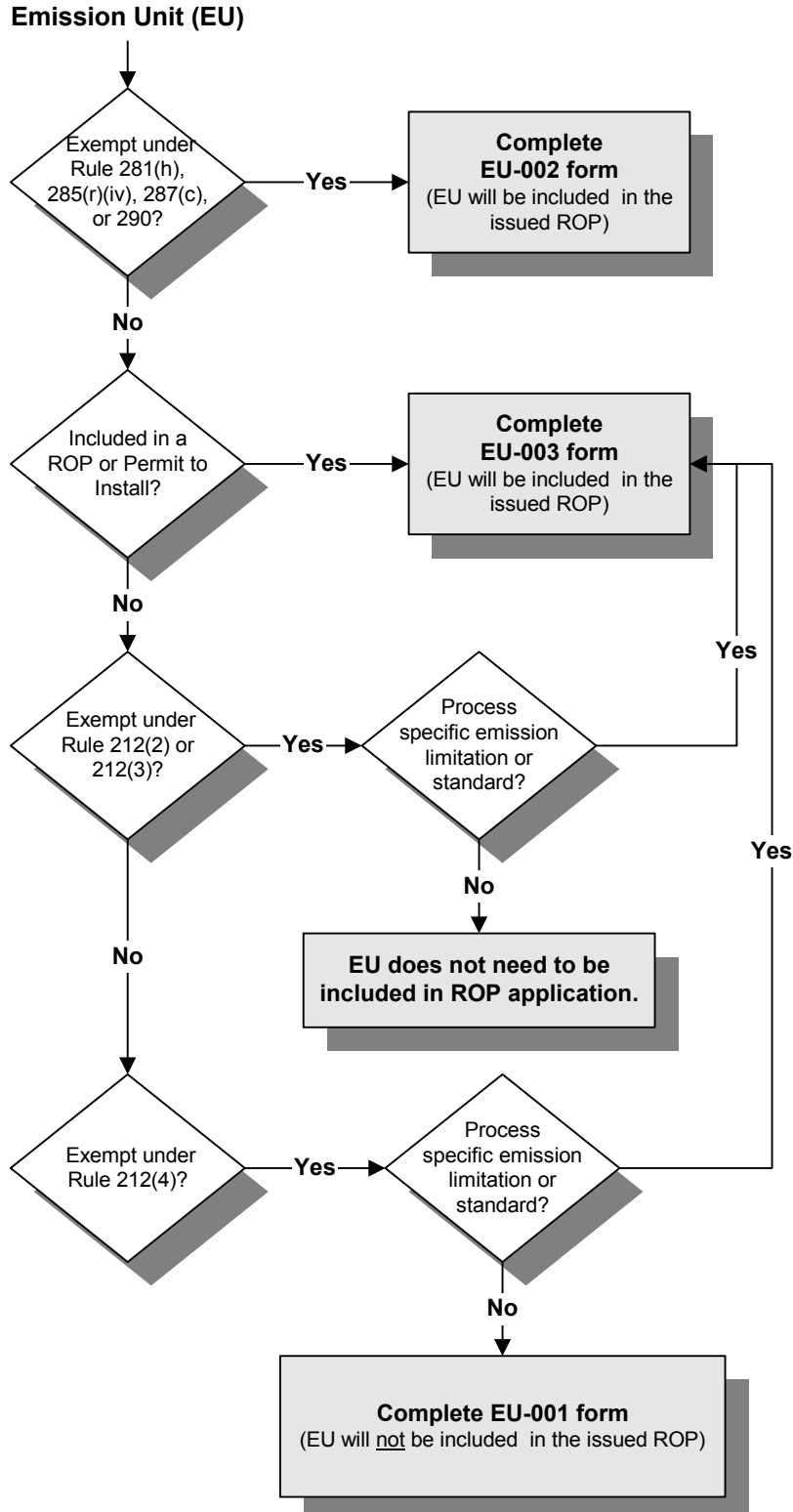


Figure 6-1: Emission Unit Decision Guide

THE EXEMPT EMISSION UNIT FORM (EU-001)

EU-001 EXEMPT EMISSION UNIT				
Form Type	EU-001	SRN	Z9999	Emission Unit 1 of 3
EMISSION UNIT IDENTIFICATION				
AQD Emission Unit ID	Operator's Emission Unit ID	If different from S-001:	SIC Code	NAICS Code
EU00001				
Operator's Emission Unit Description				
Installation Date	Date of Last Modification/Reconstruction	Dismantle Date		
MM/DD/YYYY	MM/DD/YYYY	MM/DD/YYYY		
00/00/0000	00/00/0000	00/00/0000		
EMISSION UNIT INFORMATION				
List Rule 201 Exemption Rule Number	Externally vented			
Maximum Design Capacity	Units			
List All Control Device(s) For This Emission Unit				
Operator's Additional Information ID		Display Additional Information Form	Clear Additional Information ID	

First

FORM OVERVIEW

The Exempt Emission Unit Form, EU-001, is used to identify processes and equipment considered to be exempt under Rule 212(4) (see Appendix C for Rule 212). Although this equipment is considered exempt from Rule 210 and will not appear in the issued ROP, Rule 212(4) requires the source to provide a description of these exempt emission units, including control equipment, in the ROP application. An emission unit listed within Rule 212(4) qualifies as exempt from Rule 210 **only** if it does not have a process-specific emission limitation or standard in any applicable requirement associated with the emission unit. If there is a process-specific emission limit or standard associated with the emission unit, it must be reported on an EU-003 form.

Cold cleaners, surface coating operations, and process with limited emissions which are exempt from the requirements to obtain a Permit to Install under Rules 281(h), 285(r)(iv), 287(c), and 290 are **not** exempt from the requirements of Rule 210 because they are subject to process-specific requirements. Emission units that meet the requirements of Rules 281(h), 285(r)(iv), 287(c), and 290 should be submitted on an EU-002 form (page 6-9).

If a Permit to Install has been issued pursuant to Rule 201 for any emission unit listed in Rule 212(4), and the permit is not voided, the emission unit should be considered to be a non-exempt emission unit and the required forms (EU-003, AR-001, etc.) must be completed. If you wish to eliminate the applicable requirements in the Permit to Install and operate the emission unit under Rules 280-290, it will be necessary to void the Permit to Install prior to submitting this form.

Note: The following forms do not need to be completed for emission units identified on EU-001: FG-001, AR-001, AR-002, MS-001, MS-002, and MS-003.

NEED HELP?

For assistance with identifying which emission units should be included on the EU-001 form, contact your AQD district office (see Appendix D) or the Clean Air Assistance Program at (800) 662-9278.

FORM COMPLETION INSTRUCTIONS

This form consists of two editable sections: the Emission Unit Identification section and the Emission Unit Information section. Note that your application may have some exempt emission unit records already entered. This information was imported from your most recent Michigan Air Emissions Reporting System (MAERS) submittal. Please verify that the information provided is correct and complete the remaining fields. If there is an emission unit that is exempt under Rule 212(4) at your facility and it does not have a record, you will need to create a record for it (see adding an Exempt Emission Unit on page 6-8). Step-by-step instructions on how to complete the required fields on the EU-001 form are provided on the following pages.

The top of the form displays the **Form Type** that is open (EU-001) as well as the facility's State Registration Number (SRN). This information is pre-filled and cannot be edited. In addition, a record counter, which identifies the record currently displayed appears in the upper-right corner. On this form, "Emission Unit 1 of 3" indicates that Emission Unit Form 1 of 3 is currently displayed on the screen. To move to a different form, use the arrow buttons on the tool bar, or click on the browse button (you must be in the emission unit identification area of the form to do this).

Emission Unit Identification Section

Form Type EU-001 SRN Z9999 Emission Unit 1 of 3

EMISSION UNIT IDENTIFICATION

1 AQD Emission Unit ID EU00001 2 Operator's Emission Unit ID If different from S-001: 3 SIC Code 4 NAICS Code

Operator's Emission Unit Description 5

6 Installation Date MM/DD/YYYY 00/00/0000 7 Date of Last Modification/Reconstruction MM/DD/YYYY 00/00/0000 8 Dismantle Date MM/DD/YYYY 00/00/0000

1. **AQD Emission Unit ID:** This is a unique ID assigned to the emission unit by the software. This number is automatically assigned and cannot be edited.
2. **Operator's Emission Unit ID:** Enter a unique ID for this emission unit. Emission unit operator IDs must begin with an "EU" prefix plus any combination of up to 14 letters, numbers, or keyboard

characters. Spaces are not allowed within the operator's ID. Make the emission unit operator's ID specific and easy to associate with the emission unit(s) it represents (e.g. EUPAINTBOOTHs, EUBOILER#2). An emission unit ID may have already been established in MAERS. If so, the ID will be pre-filled.

3. **SIC Code:** If the Standard Industrial Classification (SIC) Code for this emission unit is different than the SIC code that was identified on the S-001 form, select the most appropriate SIC Code. Click on this field and a drop-down list with a selection of SIC Codes will appear. Select the SIC Code that most accurately represents this emission unit. You can also begin typing in the numbers to find the appropriate SIC Code quicker.
4. **NAICS Code:** If the North American Industrial Classification System (NAICS) code for this emission unit is different than the NAICS code that was identified on the S-001 form, select the most appropriate NAICS code. Click on this field and a drop-down list with a selection of NAICS codes will appear. Select the NAICS code that most accurately represents this emission unit.
5. **Operator's Emission Unit Description:** Enter a brief narrative description of the emission unit. Include the number of similar emission units subject to the same rule exemption pursuant to Rules 279-290. For example, five natural gas space heaters may all be exempt pursuant to Rule 282 (b), or machining/grinding operations that exhaust internally to ten different baghouses may all be exempt pursuant to Rule 285 (I)(vi).
6. **Installation Date:** Enter the date that the emission unit was first installed using the date format provided (MM/DD/YYYY).
7. **Date of Last Modification/Reconstruction:** If the emission unit was modified or reconstructed since the initial installation, provide the date the emission unit was modified or reconstructed as defined in Rules 113(j) or 118(b), respectively (see Appendix C for rules 113(j) and 118(b)). Leave this field blank if the emission unit has not been modified or reconstructed.
8. **Dismantle Date:** If the emission unit has been dismantled or rendered permanently inoperable, enter the date that this occurred.

Emission Unit Information Section

EMISSION UNIT INFORMATION	
List Rule 201 Exemption Rule Number	Externally vented
Maximum Design Capacity	Units
List All Control Device(s) For This Emission Unit	

9. **List Rule 201 Exemption Rule Number:** Click on this field and a drop-down list containing Rule 201 exemption rule numbers will appear. Select the rule that exempts the emission unit from the requirement to obtain a Permit to Install (e.g., 282(a)(i), 284(b), 285(g), etc.).
10. **Externally vented:** Click on this field and a drop-down list with your choices will appear. Select “Yes” if this emission unit is vented externally to the ambient air. Select “No” if this emission unit is vented to the in-plant environment.
11. **Maximum Design Capacity:** If the exemption rule in Step 9 is based on a capacity limit, indicate the maximum design capacity of the exempt emission unit. Go to the next field and select the appropriate unit from the drop-down list. For example, Rule 282(b)(i) has a capacity limit of 50,000,000 btu/hr. If this emission unit is exempt under Rule 282(b)(i), enter the design capacity of the emission unit in these fields. Leave this field blank if the Rule 201 exemption number that was selected in Step 9 is not based on a design capacity limit.
12. **List All Control Device(s) For This Emission Unit:** Click on this field and a drop-down list of control devices will appear (Figure 6-2). If there is a control device associated with the emission unit, select the most appropriate control device code provided. If no control device is associated with this emission unit leave this field blank.

If there is more than one control device, additional control devices may be added. To add a control device go to **Edit** on the menu bar and select **Add Control Device**.

To delete a control device, select the control device that you want deleted, go to **Edit** on the menu bar and select **Delete Control Device**.

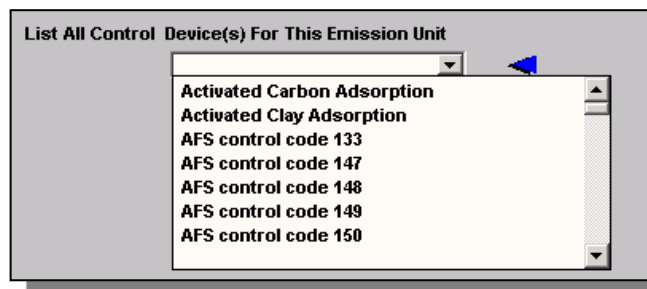


Figure 6-2: Control Devices

- 13. Operator's Additional Information ID:** An Additional Information Form (AI-001) may be used to supplement any of the information required on this form. Click on the "Display Additional Information Form" button to associate this form with an AI-001 form. When you click on this button either a blank AI-001 form will be generated for you to complete or a display window that contains AI-001 forms that have been created and not linked to another form will appear. If the display window appears select one of the AI-001 forms that have already been created and click "OK" or choose "New" to generate a blank AI-001 form. Refer to Chapter 11 for instructions on how to complete the AI-001 form and create an Operator's Additional Information ID.

If an Operator's Additional Information ID appears in this field and you would like to view the AI-001 form associated with it, click on the "Display Addition Information Form" button. If you would like to break the link to this form, click on the "Clear Additional Information ID" button. Although the ID will be cleared, the AI-001 form will still exist and can be linked to another form or deleted. Refer to Chapter 11 for guidance on deleting an AI-001 form.

The image shows a user interface element for the 'Operator's Additional Information ID'. It consists of a text input field with the label 'Operator's Additional Information ID' to its left. A small circle containing the number '13' is positioned below the input field. To the right of the input field are two buttons: 'Display Additional Information Form' and 'Clear Additional Information ID'.

Figure 6-3: Activity Information Buttons

- REMEMBER TO SAVE YOUR CHANGES! -

ADDING AN EXEMPT EMISSION UNIT

Use the following procedure to add an Exempt Emission Unit Form to your ROP application:

1. Go to **Edit** on the menu bar and select **Add Emission Unit Form** (Figure 6-4).
2. You will be given a new EU-001 form to complete.

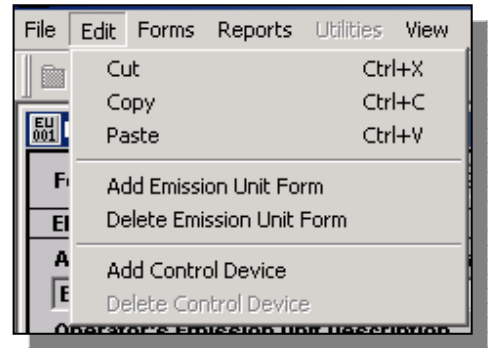


Figure 6-4: Edit Menu

DELETING AN EMISSION UNIT

Use the following procedure to delete an Exempt Emission Unit Form from your ROP application:

1. Go to the Emission Unit record you would like to delete from your application.
2. Go to **Edit** on the menu bar and select **Delete Emission Unit Form**.
3. The Exempt Emission Unit Record will be deleted from your application.

THE EMISSION UNIT FORM (EU-002) For Rule 281(h), 285(r)(iv), 287(c), or 290

EU-002 EMISSION UNIT FOR RULE 281(h)/285(r)(iv), 287(c), OR 290				
Form Type EU-002		SRN <input style="width: 50px;" type="text" value="Z9999"/>		Emission Unit 1 of 4
EMISSION UNIT IDENTIFICATION				
AQD Emission Unit ID <input style="width: 100px;" type="text" value="EU00004"/>	Operator's Emission Unit ID <input style="width: 100px;" type="text"/>	If different from S-001: <input style="width: 50px;" type="text"/>	SIC Code <input style="width: 50px;" type="text"/>	NAICS Code <input style="width: 50px;" type="text"/>
Operator's Emission Unit Description <div style="border: 1px solid black; height: 30px; width: 100%;"></div>				
Installation Date MM/DD/YYYY <input style="width: 50px;" type="text" value="00/00/0000"/>	Date of Last Modification/Reconstruction MM/DD/YYYY <input style="width: 50px;" type="text" value="00/00/0000"/>	Dismantle Date MM/DD/YYYY <input style="width: 50px;" type="text" value="00/00/0000"/>		
EMISSION UNIT INFORMATION				
Emission Unit Type <input style="width: 150px;" type="text"/>				
Compliance Status				
Are all emission units in compliance with the applicable requirements?				<input style="width: 50px;" type="text"/>
Will all emission units continue to be in compliance with the applicable requirements?				<input style="width: 50px;" type="text"/>
Were The Actual Annual Emissions And Associated Data Previously Submitted To MAERS?				<input style="width: 50px;" type="text"/>
Operator's Additional Information ID <input style="width: 100px;" type="text"/>		<input type="button" value="Display Additional Information Form"/> <input type="button" value="Clear Additional Information ID"/>		

FORM OVERVIEW

The Emission Unit Form, EU-002, is completed to identify cold cleaners exempt under Rule 281(h) or 285(r)(iv), surface coating operations exempt under Rule 287(c), and processes with limited emissions exempt under Rule 290. Emission units that meet the requirements of these rules are also subject to Rule 210 and must be included in an ROP because there are process-specific requirements associated with them. More than one emission unit can be identified on one EU-002 form as long as the emission units are similar and meet the requirements of the same rule (i.e., Rules 281(h), 285(r)(iv), 287(c), or 290). See Step 5 for more details.

Note: The following forms do not need to be completed for emission units identified on EU-002: FG-001, AR-001, AR-002, MS-001, MS-002, and MS-003.

**NEED
HELP?**

For assistance with identifying which emission units should be included on the EU-002 form, contact your AQD district office (see Appendix D) or the Clean Air Assistance Program at (800) 662-9278.

Cleaning Up the Emission Unit Forms

An Emission Unit Form will be generated for each emission unit (EU) that your facility entered into MAERS. This includes EUs that you may have marked as “dismantled” in the MAERS system over the past five years. As a result several EUs may appear in your application which are no longer at your facility. For each Emission Unit Form type (EU-001, EU-002, or EU-003), use the browse menu to compare the EUs in PASS-ROP to what is actually at your facility. The guidelines below will help you determine which EUs should be kept in your application and which ones can be deleted.

- If the dismantled EU appears in PASS-ROP on an EU form but not in your existing ROP, you can “DELETE” the emission unit form. Choose **Edit** on the menu bar and select **Delete Emission Unit Form**.
- If the dismantled EU appears in PASS-ROP on an EU form and is still in your existing ROP, you must leave it in the application. Enter a dismantle date on the EU form in the dismantle date field. You do not have to report applicable requirements associated with the EU since they would be obsolete (i.e., you do not have to complete any AR-001 or AR-002 forms).

If an emission unit was automatically imported onto the wrong EU form (e.g. the emission unit was imported onto an EU-002 form but belongs on an EU-003 form) you will need to move the emission unit record. The instructions on page 6-24 explain how to move emission unit records from one form to another.

FORM COMPLETION INSTRUCTIONS

This form consists of two editable sections: the Emission Unit Identification section and the Emission Unit Information section. You will notice that any emission units you entered in a Michigan Air Emissions Reporting System (MAERS) report that meet the criteria to be entered on this form have been automatically imported onto this form. Please make sure the information provided is correct and complete the remaining fields (see the “Cleaning up the Emission Unit Forms” discussion above). If there is a Rule 281(h), 285(r)(iv), 287(c), or 290 emission unit at your facility and it does not have a record, you will need to create a record for it (see adding an Emission Unit on page 6-13). Step-by-step instructions on how to complete the required fields on the EU-002 form are provided on the following pages.

The top of the form displays the **Form Type** that is open (EU-002) as well as the facility’s State Registration Number (SRN). This information is pre-filled and cannot be edited. In addition, a record counter that identifies the record currently displayed appears in the upper-right corner. For example, “Emission Unit 1 of 4” indicates that Emission Unit Form 1 of 1 is currently displayed on the screen. To move to a different form, use the arrow buttons on the tool bar, or click on the browse button (you must be in the emission unit identification area of the form to do this).

Emission Unit Identification Section

EMISSION UNIT IDENTIFICATION				
1	AQD Emission Unit ID EU00004	2	Operator's Emission Unit ID EU00001	If different from S-001: SIC Code
				NAICS Code
		3		4
5	Operator's Emission Unit Description Spray paint booth #1 and oven.			
6	Installation Date MM/DD/YYYY 10/20/1993	7	Date of Last Modification/Reconstruction MM/DD/YYYY 00/00/0000	8
				Dismantle Date MM/DD/YYYY 00/00/0000

1. **AQD Emission Unit ID:** This is a unique ID assigned to the emission unit by the software. This number is automatically assigned and cannot be edited.
2. **Operator's Emission Unit ID:** An emission Unit ID may have already been established in a previous ROP application or MAERS. If so, the ID will be pre-filled.

If this is an initial application or you are adding a new emission unit to your ROP application, enter a unique ID for this emission unit. Emission Unit operator IDs must begin with an "EU" prefix plus any combination of up to 14 letters, numbers, or keyboard characters. Spaces are not allowed within the operator's ID. Make the emission unit operator's ID specific and easy to associate with the emission unit(s) it represents (e.g. EU-RULE290, EU-COLDCLEAN). If you have to enter an Emission Unit ID make sure it is the same one used in your existing ROP or MAERS.

3. **SIC Code:** If the Standard Industrial Classification (SIC) Code for this emission unit is different than the SIC code that was identified on the S-001 form, select the most appropriate SIC Code. Click on this field and a drop-down list with a selection of SIC Codes will appear. Select the SIC Code that most accurately represents this emission unit. You can also begin typing in the numbers to find the appropriate SIC Code quicker.
4. **NAICS Code:** If the North American Industrial Classification System (NAICS) code for this emission unit is different than the NAICS code that was identified on the S-001 form, select the most appropriate NAICS code. Click on this field and a drop-down list with a selection of NAICS codes will appear. Select the NAICS code that most accurately represents this emission unit.
5. **Operator's Emission Unit Description:** Enter a brief narrative description of the emission unit. If there are similar emission units that meet the requirements of the same rule (i.e., Rules 281(h), 285(r)(iv), 287(c), or 290), list the total number of emission units and control devices. The description should include a summary of the devices and/or processes and products.
6. **Installation Date:** Enter the date that the emission unit was first installed using the date format provided (MM/DD/YYYY).
7. **Date of Last Modification/Reconstruction:** If the emission unit was modified or reconstructed since the initial installation, provide the date the emission unit was modified or reconstructed as defined in Rules 113(j) or 118(b), respectively (see Appendix C for rules 113(j) and 118(b)). Leave this field blank if the emission unit has not been modified or reconstructed.
8. **Dismantle Date:** If the emission unit has been dismantled or rendered permanently inoperable, enter the date that this occurred.

Emission Unit Information Section

EMISSION UNIT INFORMATION	
Emission Unit Type	<input type="text"/> 9
Compliance Status	
Are all emission units in compliance with the applicable requirements?	<input type="text"/> 10
Will all emission units continue to be in compliance with the applicable requirements?	<input type="text"/> 10
Were The Actual Annual Emissions And Associated Data Previously Submitted To MAERS?	<input type="text"/> 11

- 9. Emission Unit Type:** Click on this field and a drop-down list of rules will appear. Select the appropriate rule.
- 10. Compliance Status:** If “No” is selected for any of the questions below, a narrative compliance plan, including a schedule for compliance, must be submitted on an AI-001 form (see Rules 103(ee) and 119(a) in Appendix C for the definition of “compliance plan” and schedule of compliance”).
- Are all emission units in compliance with the applicable requirements?:** Select “Yes” if all emission units identified under the emission unit type in Step 9 are currently in compliance with the applicable requirements. Select “No” if any of the emission units identified under the emission unit type in Step 9 are not in compliance with the applicable requirements. If “No” is selected a narrative compliance plan, including a schedule for compliance, must be submitted an AI-001 form (see Step 12).
 - Will all emission units continue to be in compliance with the applicable requirements?:** (This field is not available if “No” was selected in 10a.) Select “Yes” if all emission units identified under the emission unit type in Step 9 will continue to be in compliance with the applicable requirements. Select “No” if any of the emission units identified under the emission unit type in Step 9 will not continue to be in compliance with the applicable requirements. If “No” is selected a narrative compliance plan, including a schedule for compliance, must be submitted an AI-001 form (see Step 12).
- 11. Were the Actual Annual Emissions And Associated Data Previously Submitted to MAERS?:** Material throughput and emissions data must be reported for each emission unit included on the EU-002 form. MAERS data may be used to fulfill this requirement. Select “Yes” if the emission unit(s) was reported in MAERS during the last reporting year. Select “No” if this emission unit was not reported in MAERS during the last reporting year. If “No,” is selected an AI-001 form must be created in Step 12 and the emission data must be provided on MAERS hard copy forms as an attachment. The MAERS forms can be accessed on the Internet at: www.michigan.gov/deqair (select “Emissions,” “Emissions Reporting,” then “MAERS Support Resources”).

Note: Section 5507(1)(f)(iii) of Public Act 451 of 1994, as amended (Act 451) requires actual emission rates in tons per year to be submitted as part of an administratively complete application. You may use the previous year MAERS submittal to satisfy this requirement.

- 12. Operator's Additional Information ID:** An Additional Information Form (AI-001) may be used to supplement any of the information required on this form. Click on the "Display Additional Information Form" button to associate this form with an AI-001 form. When you click on this button either a blank AI-001 form will be generated for you to complete or a display window that contains AI-001 forms that have been created and not linked to another form will appear. If the display window appears select one of the AI-001 forms that have already been created and click "OK" or choose "New" to generate a blank AI-001 form. Refer to Chapter 11 for instructions on how to complete the AI-001 form and create an Operator's Additional Information ID.

If an Operator's Additional Information ID appears in this field and you would like to view the AI-001 form associated with it, click on the "Display Addition Information Form" button. If you would like to break the link to this form, click on the "Clear Additional Information ID" button. Although the ID will be cleared, the AI-001 form will still exist and can be linked to another form or deleted. Refer to Chapter 11 for guidance on deleting an AI-001 form.

The image shows a software interface with a label "Operator's Additional Information ID" followed by a text input field. To the right of the input field are two buttons: "Display Additional Information Form" and "Clear Additional Information ID".

Figure 6-5: Activity Information Buttons

ADDING AN EMISSION UNIT

Use the following procedure to add an EU-002 form to your ROP application:

1. Choose **Edit** on the menu bar and select **Add Emission Unit Form**.
2. A new EU-002 form will be generated to complete.

DELETING AN EMISSION UNIT

Use the following procedure to delete an EU-002 form from your ROP application:

1. Select the Emission Unit record you would like to delete from your application.
2. Choose **Edit** on the menu bar and select **Delete Emission Unit Form**.
3. The Emission Unit Form will be deleted from your application.

- REMEMBER TO SAVE YOUR CHANGES! -

**NEED
HELP?**

For assistance with completing the EU-002 form, contact your AQD district office (see Appendix D) or the Clean Air Assistance Program at: (800) 662-9278.

THE EMISSION UNIT FORM (EU-003)

EU-003 EMISSION UNIT				
Form Type EU-003	SRN Z9999	Emission Unit 1 of 4		
EMISSION UNIT IDENTIFICATION				
AQD Emission Unit ID EU00007	Operator's Emission Unit ID 	If different from S-001:	SIC Code 	NAICS Code
Operator's Emission Unit Description 				
Installation Date MM/DD/YYYY 00/00/0000	Date of Last Modification/Reconstruction MM/DD/YYYY 00/00/0000	Dismantle Date MM/DD/YYYY 00/00/0000		
EMISSION UNIT INFORMATION				
Were The Actual Annual Emissions And Associated Data For This Emission Unit Previously Submitted To MAERS? <i>If No, a MAERS submittal must accompany this application</i>				
Does This Emission Unit Emit Regulated Fugitive Emissions?				
Is This Emission Unit Subject to the Federal Acid Rain Program?				
Is This Emission Unit Subject to Compliance Assurance Monitoring (CAM)?				
List All Control Device(s) For This Emission Unit		List All Stacks/Vents Associated With This Emission Unit That Have Applicable Requirements		
Control Device Code 	Number of Units 	Operator's Stack/Vent ID 		
Operator's Additional Information ID 		<input type="button" value="Display Additional Information Form"/> <input type="button" value="Clear Additional Information ID"/>		

FORM OVERVIEW

The Emission Unit Form, EU-003, is completed to identify each emission unit with applicable requirements at a source (unless already identified on the EU-002 form). Most of the emission units that you enter on this form will be the emission units that are included in your existing ROP or Permit to Install.

FORM RELATIONSHIP



The Operator's Emission Unit ID created on this form will be used to associate the emission unit with an applicable requirement on the Applicable Requirement Forms (AR-001 and AR-002). This ID is also used to incorporate the emission unit into a flexible group if necessary.

NEED HELP?

For assistance with identifying which emission units should be included on the EU-003 form, contact your AQD district office (see Appendix D) or the Clean Air Assistance Program at (800) 662-9278.

Cleaning Up the Emission Unit Forms

An Emission Unit Form will be generated for each emission unit (EU) that your facility entered into MAERS. This includes EUs that you may have marked as “dismantled” in the MAERS system over the past five years. As a result several EUs may appear in your application which are no longer at your facility. For each Emission Unit Form type (EU-001, EU-002, or EU-003), use the browse menu to compare the EUs in PASS-ROP to what is actually at your facility. The guidelines below will help you determine which EUs should be kept in your application and which ones can be deleted.

- If the dismantled EU appears in PASS-ROP on an EU form but not in your existing ROP, you can “DELETE” the emission unit form. Choose **Edit** on the menu bar and select **Delete Emission Unit Form**.
- If the dismantled EU appears in PASS-ROP on an EU form and is still in your existing ROP, you must leave it in the application. Enter a dismantle date on the EU form in the dismantle date field. You do not have to report applicable requirements associated with the EU since they would be obsolete (i.e., you do not have to complete any AR-001 or AR-002 forms).

If an emission unit was automatically imported onto the wrong EU form (e.g. the emission unit was imported onto an EU-003 form but belongs on an EU-002 form) you will need to move the emission unit record. The instructions on page 6-24 explain how to move emission unit records from one form to another.

FORM COMPLETION INSTRUCTIONS

This form consists of two editable sections: the Emission Unit Identification section and the Emission Unit Information section. You will notice that any emission units you entered in a Michigan Air Emissions Reporting System (MAERS) report that meet the criteria to be entered on this form have been automatically imported onto this form. Please make sure the information provided is correct and complete the remaining fields (see the “Cleaning up the Emission Unit Forms” discussion above). If there is an emission unit at your facility and it does not have a record, you will need to create a record for it (see adding an Emission Unit on page 6-21). Step-by-step instructions on how to complete the required fields on the EU-002 form are provided on the following pages.

The top of the form displays the **Form Type** that is open (EU-003) as well as the facility’s State Registration Number (SRN). This information is pre-filled and cannot be edited. In addition, a record counter, which identifies the form currently displayed appears in the upper-right corner. For example, “Emission Unit 1 of 4” indicates that Emission Unit Form 1 of 4 is currently displayed on the screen. To move to a different form, use the arrow buttons on the tool bar, or click on the browse button (the cursor must be in the emission unit identification section of the form to do this).

Emission Unit Identification Section

EMISSION UNIT IDENTIFICATION				
1	AQD Emission Unit ID EU00007	2	Operator's Emission Unit ID EUBOILER	If different from S-001: SIC Code 3
				HAICS Code 4
Operator's Emission Unit Description				
5	Primary boiler. Natural gas fired with #2 fuel oil as back-up. Initial rated capacity is 169 MMBtu/hr.			
6	Installation Date MM/DD/YYYY 01/20/1979	7	Date of Last Modification/Reconstruction MM/DD/YYYY 00/00/0000	8
				Dismantle Date MM/DD/YYYY 00/00/0000

1. **AQD Emission Unit ID:** This is a unique ID assigned to the emission unit by the software. This number is automatically assigned and cannot be edited.
2. **Operator's Emission Unit ID:** If this emission unit has been reported to MAERS this field will be pre-filled. If the ID is pre-filled make sure it matches the ID in your existing ROP or the Permit to Install where it was established.

If this is an initial application or you are adding a new emission unit to your ROP application, enter a unique ID for this emission unit. Emission Unit operator IDs must begin with an "EU" prefix plus any combination of up to 14 letters, numbers, or keyboard characters. Spaces are not allowed within the operator's ID. Make the emission unit operator's ID specific and easy to associate with the emission unit(s) it represents (e.g. EUPAINTBOOTH5, EUBOILER#2). If you have to enter an Emission Unit ID make sure it is the same one used in your existing ROP, Permit to Install, or MAERS.

3. **SIC Code:** If the Standard Industrial Classification (SIC) Code for this emission unit is different than the SIC code that was identified on the S-001 form, select the most appropriate SIC Code. Click on this field and a drop-down list with a selection of SIC Codes will appear. Select the SIC Code that most accurately represents this emission unit. You can also begin typing in the numbers to find the appropriate SIC Code quicker.
4. **NAICS Code:** If the North American Industrial Classification System (NAICS) code for this emission unit is different than the NAICS code that was identified on the S-001 form, select the most appropriate NAICS code. Click on this field and a drop-down list with a selection of NAICS codes will appear. Select the NAICS code that most accurately represents this emission unit.
5. **Operator's Emission Unit Description:** Enter a brief narrative description of the emission unit. This description should include the process and control devices that make up the emission unit. You may want to include a process flow diagram detailing the devices in the emission unit on or attached to an AI-001 form.
6. **Installation Date:** Enter the date that the emission unit was first installed using the date format provided (MM/DD/YYYY).
7. **Date of Last Modification/Reconstruction:** If the emission unit was modified or reconstructed since the initial installation, provide the date the emission unit was modified or reconstructed as defined in Rules 113(j) or 118(b), respectively (see Appendix C for rules 113(j) and 118(b)). Leave this field blank if the emission unit has not been modified or reconstructed.
8. **Dismantle Date:** If the emission unit has been dismantled or rendered permanently inoperable, enter the date that this occurred. If a dismantle date is entered you will not have to complete any other forms for this emission unit (i.e., you do not have to complete AR-001 and AR-002 forms).

Emission Unit Information Section

EMISSION UNIT INFORMATION							
Were The Actual Annual Emissions And Associated Data For This Emission Unit Previously Submitted To MAERS? <i>If No, a MAERS submittal must accompany this application</i>							
Does This Emission Unit Emit Regulated Fugitive Emissions?							
Is This Emission Unit Subject to the Federal Acid Rain Program?							
Is This Emission Unit Subject to Compliance Assurance Monitoring (CAM)?							
List All Control Device(s) For This Emission Unit <table border="1"> <thead> <tr> <th>Control Device Code</th> <th>Number of Units</th> </tr> </thead> <tbody> <tr> <td>13 <input type="text"/></td> <td><input type="text"/></td> </tr> </tbody> </table>	Control Device Code	Number of Units	13 <input type="text"/>	<input type="text"/>	List All Stacks/Vents Associated With This Emission Unit That Have Applicable Requirements <table border="1"> <thead> <tr> <th>Operator's Stack/Vent ID</th> </tr> </thead> <tbody> <tr> <td>14 <input type="text"/></td> </tr> </tbody> </table>	Operator's Stack/Vent ID	14 <input type="text"/>
Control Device Code	Number of Units						
13 <input type="text"/>	<input type="text"/>						
Operator's Stack/Vent ID							
14 <input type="text"/>							
15 Operator's Additional Information ID <input type="text"/>							
<div> <input type="button" value="Display Additional Information Form"/> <input type="button" value="Clear Additional Information ID"/> </div>							

- 9. Were The Actual Annual Emissions And Associated Data For This Emission Unit Previously Submitted to MAERS?:** Material throughput and emissions data must be reported for each emission unit included on the EU-003 form. MAERS data may be used to fulfill this requirement. Select "Yes" if the emission unit(s) was reported in MAERS during the last reporting year. Select "No" if this emission unit was not reported in MAERS during the last reporting year. If "No," is selected an AI-001 form must be created in Step 15 and the emission data must be provided on MAERS hard copy forms as an attachment. The MAERS forms can be accessed on the Internet at www.michigan.gov/deqair (select "Emissions," "Emissions Reporting," then "MAERS Support Resources").

Note: Section 5507(1)(f)(iii) of Public Act 451 of 1994, as amended (Act 451) requires actual emission rates in tons per year to be submitted as part of an administratively complete application. You may use the previous year MAERS submittal to satisfy this requirement.

- 10. Does This Emission Unit Emit Regulated Fugitive Emissions?:** Select "Yes" if this emission unit emits regulated fugitive emissions. Select "No" if this emission unit does not emit regulated fugitive emissions.

Fugitive emissions may be regulated through federal regulation, state rule, or permit condition (e.g., Fugitive dust plans, Synthetic Organic Chemical Manufacturing Industry (SOCMI) leak detection program, or fugitive monitoring plan). If fugitive emissions are regulated at your source, there will be applicable requirements that pertain specifically to fugitive emissions in your ROP. *The applicable requirements that pertain to fugitive emissions will be reported on the appropriate Applicable Requirement Forms (AR-001, AR-002).*

- 11. Is This Emission Unit Subject to the Federal Acid Rain Program?:** Select "Yes" if this emission unit is subject to the Federal Acid Rain Program (40 CFR Part 72). Select "No" if this emission unit is not subject to the Federal Acid Rain Program.

Note: If "Yes," Federal Acid Rain application forms were required to be submitted to the AQD and to the EPA in accordance with 40 CFR 72.30 for new submittals or 40 CFR 72.30(c) for renewal of an existing Acid Rain Permit. Acid Rain application forms are available from the AQD upon request or at the EPA Acid Rain web site www.epa.gov/airmarkets/arp/index.html.

The Federal Acid Rain Program

Electric generating units (EGU) which sell electricity to the grid and burn fossil fuel may be required to obtain and operate in compliance with a Phase II acid rain permit, pursuant to Title IV of the federal Clean Air Act. Those EGUs that have a nameplate capacity of less than 25 MW and burn a fuel with an annual average sulfur content of less than 0.05% are exempt from Title IV.

The AQD is the authority responsible for issuance of Phase II acid rain permits in Michigan. Those units which become subject to Title IV are required to submit an application to the AQD 24 months before the unit commences operation. One copy must also be sent to the U.S. EPA. Those units which are exempt from the program must submit the exemption form (original and one copy) to the AQD. Application and exemption forms and their instructions are available from the U.S. EPA Acid Forms Web Page www.epa.gov/airmarkets/arp/index.html.

For more information about the Acid Rain Program go to: www.michigan.gov/deqair (select "Permits") or contact Brian Carley with the AQD at (517) 780-7843 or carleyb@michigan.gov.

- 12. Is This Emission Unit Subject to Compliance Assurance Monitoring (CAM)?:** Select "Yes" if this emission unit is subject to the 40 CFR Part 64 CAM requirements. Select "No" if this emission unit is not subject to compliance assurance monitoring.

If "Yes" is selected, provide a complete CAM plan using an Additional Information Form (AI-001). More information about CAM applicability and requirements is available on page 6-22.

- 13. List All Control Devices For This Emission Unit:** Click on this field and a drop-down list of control devices will appear (Figure 6-6). If there is a control device associated with the emission unit, select the most appropriate control device provided. Leave this field blank if no control device is associated with this emission unit.

If there is more than one control device, additional control device codes may be added. After the first control device has been selected, go to **Edit** on the menu bar and select **Add Control Device**. Another field will appear. Select another control device.

To delete a control device, select the control device that you want deleted, go to **Edit** on the menu bar and select **Delete Control Device**.

Next to each of the selected control devices, enter how many of that particular control device are associated with the emission unit.

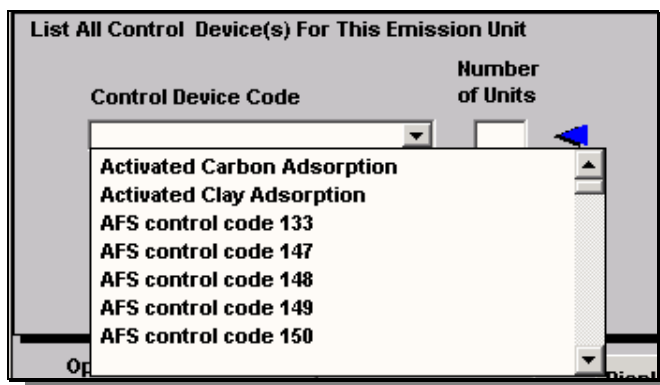


Figure 6-6: Control Device Codes

14. List All Stack/Vents Associated With This Emission Unit That Have Applicable

Requirements: Click on this field and a drop-down list will appear containing stack/vent Operator IDs that were established in your previous MAERS submittals. If there is a stack/vent associated with the emission unit and it has applicable requirements (e.g. height, diameter, etc.) select the appropriate stack/vent ID. Leave this field blank if no stack/vent **with applicable requirements** is associated with the emission unit.

If you need to include a stack/vent in your application that is not included in the drop-down list, complete a MAERS SV-101 hard-copy form for each stack that you are reporting (Figure 6-7). Reference the SV-101 form(s) on an AI-001 form and then attach the SV-101 form(s) to the hard-copy of the AI-001 form. You can obtain the SV-101 form via the Internet at www.michigan.gov/deqair (select “Emissions,” “Emissions Reporting,” then “MAERS Support Resources”).

Note: General ventilation (i.e., roof vents, windows, and doors) need not be identified unless considered as exhaust points during New Source Review and have an applicable requirement.

If there is more than one stack/vent with applicable requirements associated with this emission unit, additional stack/vent operator IDs may be added. After the first stack/vent ID has been selected, choose **Edit** on the menu bar and select **Add Stack**. Another field will appear. Select another stack/vent ID.

To delete a stack/vent ID, select the stack/vent ID that you want deleted, go to **Edit** on the menu bar and select **Delete stack**.

The form is titled "2002 SV-101 STACK" and is from the Michigan Department of Environmental Quality (DEQ). It includes a header with the DEQ logo and the text "Michigan Department of Environmental Quality - Air Quality Division" and "Michigan Air Emissions Reporting System (MAERS)". Below the header, there is a section for "FORM REFERENCE" with fields for "1. Form Type SV-101" and "2. ADD/Remove ID (ID#)". The main body of the form is divided into several sections: "STACK IDENTIFICATION" (with fields for "3. ADD Stack ID", "4. Operator's Stack ID", "5. Remove from MAERS", and "6. Demand Date (MM/DD/YYYY)"), "Operator's Stack Description" (field "7. Operator's Stack Description"), "Physical Parameters" (fields "8. Actual Stack Height Above Ground", "9. Inside Stack Diameter", "10. Exit Gas Temperature", "11. Typical Exit Gas Flow Rate", "12. Stack Orientation", "13. UTM Zone", "14. UTM East", "15. UTM North", and "16A. Bypass Stack Only"), and "Operational Parameters" (fields "10. Exit Gas Temperature", "11. Typical Exit Gas Flow Rate", "12. Stack Orientation", "13. UTM Zone", "14. UTM East", "15. UTM North", and "16A. Bypass Stack Only"). The form also includes a "GENERAL INSTRUCTIONS" section at the top right and a "DEQ SV-101 (Rev. 8/02)" label at the bottom right.

Figure 6-7: SV-101 Form

- 15. Operator's Additional Information ID:** An Additional Information Form (AI-001) may be used to supplement any of the information required on this form. Click on the “Display Additional Information Form” button to associate this form with an AI-001 form. When you click on this button either a blank AI-001 form will be generated for you to complete or a display window that contains AI-001 forms that have been created and not linked to another form will appear. If the display window appears select one of the AI-001 forms that have already been created and click “OK” or choose “New” to generate a blank AI-001 form. Refer to Chapter 11 for instructions on how to complete the AI-001 form and create an Operator's Additional Information ID.

If an Operator's Additional Information ID appears in this field and you would like to view the AI-001 form associated with it, click on the “Display Addition Information Form” button. If you would like to break the link to this form, click on the “Clear Additional Information ID” button. Although the ID will be cleared, the AI-001 form will still exist and can be linked to another form or deleted. Refer to Chapter 11 for guidance on deleting an AI-001 form.

ADDING AN EMISSION UNIT

Use the following procedure to add an Emission Unit Form (EU-003) to your ROP application:

1. Choose **Edit** on the menu bar and select **Add Emission Unit Form**.
2. A new EU-003 form will be generated to complete.

DELETING AN EMISSION UNIT

Use the following procedure to delete an Emission Unit Form (EU-003) from your ROP application:

1. Select the Emission Unit record you would like to delete from your application.
2. Choose **Edit** on the menu bar and select **Delete Emission Unit Form**. A screen will appear that identifies the forms associated with the EU-003 form you wish to delete. These forms must be deleted before you can delete the EU-003 form.
3. Once you have deleted all the forms associated with the EU-003 form, delete the EU-003 form (repeat Steps 1 and 2 above).

Note: If there are no forms associated with the EU-003 form you want to delete, the EU-003 form will be deleted in Step 2.

- REMEMBER TO SAVE YOUR CHANGES! -

**NEED
HELP?**

For assistance with completing the EU-003 form, contact your AQD district office (see Appendix D) or the Clean Air Assistance Program at: (800) 662-9278.

The Compliance Assurance Monitoring (CAM) Rule (40 CFR Part 64) and Renewable Operating Permits

Stationary sources that are required to obtain an ROP may also be required to submit a CAM Plan with either their initial or renewal ROP application. Stationary sources may be subject to the CAM Rule if they are required to obtain an ROP and have an emission unit for which both of the following conditions are met:

- The emission unit uses a control device to achieve compliance with an emission limitation or standard for the applicable pollutant.
- The emission unit has potential pre-control emissions which are over 100 percent of the major source threshold amount (considered to be major under the ROP Program) for the applicable pollutant (see Table 1-1 on page 1-2 of this workbook for the major source thresholds).

Generally, the CAM Plan will be due with the ROP renewal application if the initial ROP application was received before April 20, 1998 (see Table 6-1). A CAM Plan may be due with an initial ROP application received after April 20, 1998 for large pollutant-specific emission units (see Table 6-1 for definition).

The CAM Plan will generally be submitted with an ROP application on an AI-001 form (the CAM applicability field is item number 10 on the EU-003 form). A CAM Plan should be submitted for each pollutant-specific emission unit that is subject to the Rule. However, only one plan is needed if multiple emission units share the same control device for the regulated pollutant or if multiple control devices of similar design and operation for the regulated pollutant share the same emission unit. If periodic monitoring must be added to your existing ROP, you will have to propose the periodic monitoring on an AR-002 form and describe it on an MS-001, MS-002, or MS-003 form.

The general outline of a CAM Plan is:

- I. Background
- II. Monitoring approach
 - A. Indicators
 - B. Indicator Range
- III. Performance criteria
- IV. Justification

Additional information on CAM exemptions and CAM Plan preparation may be obtained on the Internet at: www.michigan.gov/degair (select "Permits," "Renewable Operating Permits," "Background & Support Information," then "Compliance Assurance Monitoring"). Questions concerning CAM may be directed to Dennis Dunlap with the AQD, at (269) 567-3553 or dunlapd@michigan.gov.

Table 6-1: When are CAM Plans Due?

Pollutant-Specific Emission Unit Size	ROP Application Received Before 4/20/98				ROP Application Received After 4/20/98	
	CAM Plan due as part of initial ROP application?	ROP not issued, CAM Plan due if application modified?	ROP issued, CAM Plan due if modification request is submitted?		CAM Plan due with initial ROP application?	
	No, but due with ROP renewal application	Yes, if modification equivalent to a significant modification [Rule 216(3)] applies to pollutant-specific emission unit	Yes, if a significant modification [Rule 216(3)] applies to pollutant-specific emission unit		YES	
Large ¹	No, but due with ROP renewal application	Yes, if modification equivalent to a significant modification [Rule 216(3)] applies to pollutant-specific emission unit	Yes, if a significant modification [Rule 216(3)] applies to pollutant-specific emission unit		YES	
Other ²	No, but due with ROP renewal application	NO	NO		No, but due with ROP renewal application	

¹ A large pollutant-specific emission unit has post-control emissions over 100 percent of the major source thresholds.

² An other pollutant-specific unit has post-control emissions under 100 percent of the major source thresholds.

MOVING IMPORTED EMISSION UNITS BETWEEN EU FORMS

Since emission unit (EU) information is imported from MAERS, there may be instances where an EU appears in PASS-ROP on an incorrect EU form (e.g., PASS-ROP enters an EU on an EU-001 form, but it should be entered on an EU-003 form). To move an EU from one EU form to another follow the instructions below:

1. Close out of all forms.
2. Choose **Utilities** on the menu bar and select **Change EU Form Type** (Figure 6-8). A window will appear which displays all emission units that are in your application and the EU form on which they appear (Figure 6-9).

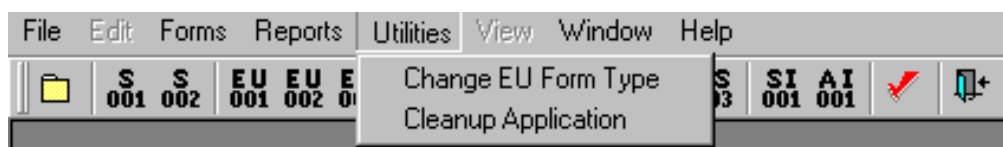


Figure 6-8: Utilities Menu

3. Select the emission unit you would like to move from the list, then choose the emission unit form type you would like to move it to by clicking on the appropriate radial button under "New Form Type."
4. Click on the Change button. The emission unit will now appear on the form you changed it to.



Figure 6-9: Change EU Form Type Menu